

Thomas, Dennis  
Page 1 of 1

May 21, 2004

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Tom Grim -DOE/NNSA  
Livermore Site Office, L-293  
7000 East Ave.  
Livermore, CA 94550

Dear DOE/NNSA,

The Livermore Laboratory's draft Site-Wide Environmental Impact Statement is not valid.

- 1/31.03 | It needs to be reviewed by the General Accounting Office or an independent organization for it to have any credibility.  
In hearings, the public reviewed it and found it lacking in content and in the accuracy of figures that were presented.
- 2/23.01 | The radioactivity release figures are low by factors of thousands to hundreds of thousands based on the leaks that occurred at Rocky Flats, Hanford and even Lawrence Livermore.
- 3/16.03 | The SWEIS ignores the potential damage to endangered species at Site 300 such as the red-legged-frog. It ignores the fact that there is no current method to dispose of plutonium and that the Lab wants to double the limit of 1540 pounds of plutonium because no other DOE facility will take the plutonium the Lab now has.
- 4/33.01 | The SWEIS does not adequately address the dramatic increase in risk, exposure and accident of airborne plutonium in the Vapor Laser Separator.
- 5/27.02 | The SWEIS does not address proliferation. A mandate of the Livermore Lab is to prevent proliferation yet building plutonium pits is proliferation.
- 6/01.01 | The SWEIS is not valid. It needs an independent review as do the assumptions and policies that call for new nuclear and biological weapons.
- 1/31.03 cont.

Sincerely,  
*Dennis Thomas*  
Dennis Thomas  
147 St. Germain  
Pleasant Hill, CA 94523

Thompson, Bill and June  
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*Thomas Grim, Document Manager May 26, 2004*  
U.S. Dept. of Energy / NNSA  
Livermore Site Office, L-293  
7000 East Avenue  
Livermore, CA 94550-9234

*Re LLNL SW/SPEIS - You're planning on increasing the amount of tritium, lithium, highly enriched uranium, doubling the amount of plutonium at the lab and increasing the amount per room by ten times, and vaporizing Plutonium and you want our opinion?*

*Madness! carried to the last degree by adding pathogens such as anthrax, botulism and plague to the mix to make them more lethal for bio warfare. LLNL is already a Superfund cleanup site, has contaminated groundwater, and radioactivity has moved off site and you are considering expanding these horrors?*

*Would you kindly come to your senses and spend your money and ingenuity figuring out how to clean up this appalling mess? We are systematically destroying the planet with radioactive waste we have already accumulated and continue to proliferate. Sincerely,*  
*Bill Thompson 3084 Jacoby Creek Road*  
*Bay Side, CA 95524*

Thompson, John  
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-----Original Message-----

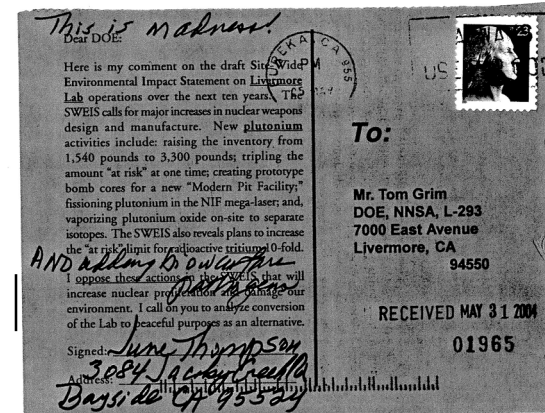
From: John Thompson [mailto:magdalena4@mac.com]  
Sent: Thursday, May 20, 2004 1:14 PM  
To: tom.grim@oak.doe.gov  
Subject: Livermore lab

1/07.01

I am opposed to the presence of plutonium at the Livermore Lab, and ask that this location be converted to civilian science projects that will better serve the future needs of taxpaying Americans.  
John Thompson P.O. Box 4353 Carmel Calif. 93921

Thompson, June  
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1/01.01  
2/04.01  
3/07.01



Tobin, Bryndis  
Page 1 of 1

Mr. Grim,

1/02.01 I am horrified - and furious - at the foolhardy notion that the U.S. should build any more nuclear weapons.

2/23.01 I am particularly outraged at the prospect of yet more radioactive waste poisoning not only our "enemies" - and their innocent wives and children - but our brave servicemen & women, currently falling sick at a horrific rate due to overuse, misuse and failure to clean up after previous filthy bombing on our part.

3/30.01 However, I am even more vehemently opposed to the obvious stupidity of increasing the level of radioactive contaminants travelling through and residing in a highly populated sector of the U.S. I deeply resent the notion of making the Bay Area an even more attractive target for terrorists in an attempt to pursue a policy guaranteed to create more terrorists. The only thing this policy has in its favor is that it shows Bush and his cronies to be hypocrites beyond a shadow of a doubt. -Bryndis Tobin

Torres, Zoe Marie  
Page 1 of 1

TO: Thomas Grim

1/04.01 I think you must be an intelligent person. You are probably very kind and maybe you have a family of your own. Children maybe? As a citizen of San Francisco, California, the U.S., and, more broadly and perhaps even more profoundly, as a creature and citizen of this suffering yet always beautiful planet, I, Zoe Torres, implore you to do what you probably, in your heart of kindest hearts, know is right. PLEASE do all that you can to keep the proposal to allow nuclear testing and plutonium at the Lawrence Livermore Labs from passing. Hasn't our planet seen enough violence and destruction? Aren't the cancer rates high enough? The maddening situation in Iraq is just one example of the growing injustice and irrationality taking hold of our leaders. They cannot be trusted with this kind of power! And if you are of the mindset that says yes, they can, then just think of the likelihood of other countries following suit--they cannot be trusted either!

Thank you for your time and understanding, I'm sure that you will do the right thing and vehemently oppose the proposal.

Sincerely,  
Zoe Marie Torres  
437 Randolph st.  
S.F., Ca 94132

**Tracy Regional Alliance for a Quality Community**  
**Page 1 of 1**

**TRAQC – Tracy Region Alliance for a Quality Community**  
 PO Box 1299 Tracy, CA 95378 email [traqc@reachme.net](mailto:traqc@reachme.net) www.traqc.com

May 21, 2004

Mr. Tom Grim  
 DOE, NNSA, L-293  
 7000 East Avenue  
 Livermore, CA 94550  
[Tom.grim@oak.doe.gov](mailto:Tom.grim@oak.doe.gov)

RE: Request for a 30 Day Extension for Public Comment on the Draft Site-Wide Environmental Impact Statement for Continued Operation of Lawrence Livermore National Laboratory and Supplemental Stockpile Stewardship and Management Programmatic Environmental Impact Statement (LLNL SW/SPEIS)

Dear Mr Grim:

1/31.06 We have just recieved the complete three volume document on the Site Wide EIS for the Lawrence Livermore National Lab and Site 300 at your meeting in Tracy on April 28,2004. We have filed preliminary comments but after review of the draft documents we find it necessary to request the Technical Appendicies to these documents to fully eveluate your proposal.

2/31.02 We request the Technical Appendices and an additional 30 days to evaluate and  
 3/20.04 comment on this proposal. TRAQC has grave concerns about additional explosives  
 4/09.03 and radioactive material transported through Tracy and up the unimproved Corral  
 Hollow Rd. We beleive that the document does not fully address the development of  
 the Tracy Hills Project a 5,500 unit residential community within one mile of Site 300.  
 2/31.02 We request that the Dept. of Energy extend the public comment period by 30 days from  
 May 27 to June 27 and provide us with the techncial apencies to the Draft LLNL  
 SW/SPEIS.

cont.

Sincerely,



**Tri-Valley CAREs, Loulena Miles, Staff Attorney**  
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**Tri-Valley CAREs**

**Communities Against a Radioactive Environment**

2582 Old First Street, Livermore, CA 94551 • (925) 443-7148 • Fax (925) 443-0177



May 12, 2004 *Peace Justice Environment  
since 1983*

Mr. Tom Grim  
 Document Manager  
 Department of Energy  
 National Nuclear Security Administration  
 Livermore Site Office  
 PO Box 808, L-293  
 7000 East Avenue  
 Livermore, CA 94551-0808

**Subject: SWEIS reference documents**

Dear Mr. Grim,

Today we received a portion of the reference documents from you that we requested on April 28<sup>th</sup> for the Draft Site-Wide EIS. We offered to provide the community with access to the documents during evenings and weekends. Most of our members work, making the reading room not a practical location for our members to obtain access to these materials. We will ensure that these documents are made available to our members and the community to the fullest extent possible. We appreciate your reconsideration of this matter and your attempt to meet us half-way in responding to our request.

1/31.06 Your accompanying letter contained your rationale for providing only a portion of the  
 2/25.06 reference materials. You stated that you have provided the reference materials that you believed were directly relevant to our comments. We would like to point out that there is an area that we and other commenters highlighted and that is the reference materials for the Accident Analysis - Appendix D. These references are extremely critical to our analysis of the Draft SWEIS. Ensuring that a well thought out study of potential accidents is included in the SWEIS is of the utmost concern to our members. An accident at the lab could be catastrophic and community members (including workers) need to be able to ascertain that these scenarios were carefully considered. We would appreciate if you could provide us with the underlying reference documents for the accident scenarios. These documents will provide the slope factors and the assumptions that were made in determining the likelihood that an accident will occur and what the consequences would likely be.

3/31.02 Additionally, with 10 working days left before the comment deadline, we also feel it would be prudent for the Department of Energy to extend this deadline for at least one

**Tri-Valley CAREs, Loulena Miles, Staff Attorney**  
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3/31.02  
 cont.

month in order to ensure that legislators, regulators and community members have a meaningful opportunity to comment on this 2000-plus page document. The hearings on April 27<sup>th</sup> and April 28<sup>th</sup> were the vehicle through which many people in the surrounding areas learned about many of the new proposals in the Draft Site-Wide EIS. As we stated at the April 28<sup>th</sup> hearing in Tracy, community members had told us they felt they needed additional time and information in order to fully comment. Our office has received a number of calls from community members and organizations who are attempting to read through the document but are worried that they won't have time to review it and write their comments before the deadline. In light of this, we again urge you to extend the comment deadline for an additional 30 days.

Thank you in advance to your attention to this matter.

Sincerely,



Loulana Miles  
 Staff Attorney  
 Tri-Valley CAREs

**Tri-Valley CAREs, Marylia Kelly, Executive Director**  
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**Grim, Tom**

**From:** marylia@earthlink.net  
**Sent:** Monday, May 10, 2004 11:06 AM  
**To:** heffner1@llnl.gov; tom.grim@oak.doe.gov  
**Subject:** SWEIS: Follow up on Request for Reference Documents

May 7, 2004

Bert Heffner  
 Lawrence Livermore National Laboratory  
 7000 East Avenue  
 Livermore, CA 94550

By email

RE: Draft Site-wide Environmental Impact Statement for Continued Operation of Lawrence Livermore National Laboratory and Supplemental Stockpile Stewardship and Management Programmatic Environmental Impact Statement (February, 2004)

Dear Bert:

The recent release of the Site Wide EIS for Livermore Lab operations and the subsequent Public Hearings have resulted in numerous requests made to our office for more complete information. We have heard from Livermore and Tracy residents among others. We are called upon to respond to physicists, chemists and other specialists as well as other community residents.

On behalf of Tri-Valley CAREs' membership and other information requesters in the community, I am sending this follow up letter to ask that Tri-Valley CAREs receive all of the unclassified and/or declassified reference documents for the draft site-wide EIS.

This request for the reference documents follows the conversation held during the question and answer period during the Public Hearing in Tracy, California on April 28. During that time, a request was made by Marion Fulk, LLNL staff scientist retired, for the background documents. As I stated at the Public Hearing, Tri-Valley CAREs offices are generally open to the public 6 days a week (Mon. through Sat.). I also stated our request for the documents and our willingness to put them in our reading room where they will be accessible to all visitors. Additionally, we have a check out system available on request for documents in our reading room. This will allow members of the public to borrow any document(s) for a limited period of time.

Here is what members of the public are telling us. It is impossible to adequately evaluate the site wide EIS without the reference documents on which the conclusions in the site wide EIS are based. The LLNL visitors center is open only select afternoon hours during the work week. The background/reference documents for the site wide EIS are not easily accessible and there is no opportunity to check them out from LLNL.

Therefore, we believe that giving Tri-Valley CAREs a set of reference documents is consistent with DOE and LLNL obligations to inform the public and encourage public comment on the site wide EIS.

I have not heard from LLNL or DOE since the Public Hearing on this issue, and so I write you today. I would very much appreciate your prompt attention to this as the comment period is currently

Tri-Valley CAREs, Marylia Kelly, Executive Director  
Page 2 of 2

scheduled to end on May 27 - and it will take Tri-Valley CAREs some number of days (if not weeks) to go through the materials.

Sincerely,

Marylia Kelley  
Executive Director

2/31.02 P.S. As you know, Tri-Valley CAREs has requested a 30 day extension of the public comment period from DOE. This letter reiterates that request as well. The site wide EIS is a complex document and it does require the additional time to produce thorough and informed comments.

--MK

cc  
Tm Grim, U.S. DOE, NNSA

Marylia Kelley  
Executive Director  
Tri-Valley CAREs  
(Communities Against a Radioactive Environment)  
2582 Old First Street  
Livermore, CA USA 94551

<<http://www.trivalleycares.org>> - is our web site address. Please visit us there!

(925) 443-7148 - is our phone  
(925) 443-0177 - is our fax

Tri-Valley CAREs, Marylia Kelly, Executive Director  
Page 1 of 2

Grim, Tom

From: marylia@earthlink.net  
Sent: Friday, May 21, 2004 6:17 PM  
To: tom.grim@oak.doe.gov  
Subject: Note on SWEIS extension request

Hi, Tom:

Apologies for the informality of an email note, but I want to convey a couple of things regarding our request for an extension of the public comment period for the SWEIS.

First, I want to acknowledge, again, that I recognize that a 90 day comment period is more than is legally required. When you first announced a 90 day comment period, I first thought that would be plenty of time for us to analyze the document. Then I started reading it. I am now acutely aware that TWO things are true: One, that 90 days is more than the legal minimum, and two that the SWEIS for LLNL is more complex than your average SWEIS.

This is perhaps the long way around to saying that I am still reading through the SWEIS and I have the reference documents (some in our office -- thanks -- and some at LLNL) that I want to go through before we submit our organizational comments. As you doubtless know, some of those reference documents are heavy slogging and collectively there are boxes and boxes of them! While DOE may decide to differ with us on the content of some of Tri-Valley CAREs comments, it is none the less true that I am doing my best to do a good job on them -- and I really do need more time.

1/31.02, 31.06 Second, it is equally true that other groups and individuals have called us to ask if we have recieved or will receive an extension. Over the last couple of days, I have begun telling people that I don't know and that folks should communicate with you directly. Perhaps they have, perhaps not. At any rate, I know that others in addition to Tri-Valley CAREs -- including but not limited to the 21 groups who signed the request letter -- would truly benefit from an extension of the comment period.

And, finally, DOE would not necessarily need to stretch its own schedule in order to grant an extension of the public comment period. For example, DOE needs to compile the transcripts from the public hearings. The DOE could do that and also could begin processing, tabulating and internally responding to the comment letters received to date even as the comment period is extended. Therefore, an extension of the comment period need not mean ANY slippage of the December date for circulating the final.

In closing, I reiterate our request for a 30 day extension, but would add that even a two week extension would help a lot! Please consider this option if you truly think 30 days is too much. My goal here is to provide comments that are as in-depth and complete as I can make them, not to bolix up your schedule. In considering this request, please remember how long it took DOE between scoping in 2002 and the circulation of the draft in 2004. It really is a complex document!

Thank you in advance for your attention.

Peace,  
Marylia

**Tri-Valley CAREs, Marylia Kelly, Executive Director**  
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Marylia Kelley  
 Executive Director  
 Tri-Valley CAREs  
 (Communities Against a Radioactive Environment)  
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 Livermore, CA USA 94551

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**Tri-Valley CAREs, Marylia Kelly, Executive Director**  
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**Tri-Valley CAREs**

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Peace Justice Environment  
 since 1983

Sent by email and postal mail

June 14, 2004

Mr. Tom Grim  
 Document Manager, SWEIS  
 US Department of Energy, NNSA, L-293  
 7000 East Avenue  
 Livermore, CA 94550

**Additional Comments of Tri Valley CAREs on the Draft Site-Wide Environmental  
 Impact Statement for Continued Operation of Lawrence Livermore National  
 Laboratory and Supplemental Stockpile Stewardship and Management  
 Programmatic Environmental Impact Statement (SWEIS)**

Dear Mr. Grim:

As I discussed with you by phone and in prior correspondence, Tri-Valley CAREs needs additional time to complete its comments on the Draft SWEIS. As the Department of Energy (DOE) has refused to extend or reopen the public comment period, I am therefore sending these additional comments as soon as practicable -- even though they are a "work in progress" in the sense that Tri-Valley CAREs has not had time to finish an analysis of the unclassified reference documents that we received from DOE near the end of the public comment period. (Further, we have still not received any substantive documents in response to our two relevant Freedom of Information Act (FOIA) requests.)

These additional comments and questions follow an initial reading of as many of the reference documents as is possible by this date. This comment letter focuses on the unclassified reference documents for accidents and Appendix D of the SWEIS. Again, it is not that Tri-Valley CAREs does not have other concerns/questions/comments -- e.g., on other reference documents -- it is that appropriate time was not given to undertake the necessary analyses and prepare those comments.

**Accident -- Unclassified Reference Documents**

1. The accident analysis for bio-hazards incorporates analyses previously performed by the U.S. Army in 1989. We are certain that this information is out of date. Have there been additional accident analyses performed by NNSA for bio-hazards resulting from operation of LLNL? If so, please identify these analyses.
2. Has the accident analysis for the Biosafety Level-3 (BSL-3) been updated to account for additional plutonium and tritium handled and processed under the proposed action? If so, please provide this document or identify it in the background documents.

1/31.06

2/25.04

Tri-Valley CAREs, Marylia Kelly, Executive Director  
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3/31.06

3. After reviewing the available Background Documents relating to the accident analysis, Tri-Valley CAREs has determined that documents regarding several buildings in the Superblock were not included. As a result, we cannot check the references in the document to determine the adequacy of the SWEIS. The missing documents include:

- LLNL, *Safety Analysis Report, Heavy Element Facility, Building 251*, UCRL-AR-113377, Rev. 1, Lawrence Livermore National Laboratory, Livermore, CA, April 1, 2001.
- LLNL, *Building 334 Safety Analysis Report*, SAR-B334, Rev.1, Lawrence Livermore National Laboratory, Defense and Nuclear Technologies Directorate, Livermore, CA, March 2001.
- LLNL, *Building 331 Safety Analysis Report*, TSR B331, Lawrence Livermore National Laboratory, Livermore, CA, June 2002.
- LLNL 2002af LLNL, *Building 332 (UNCI), Plutonium Facility Safety Analysis Report*, SAR-332, NMTP-02-067, Lawrence Livermore National Laboratory, Nuclear Materials Technology Directorate, Livermore, CA, June 26, 2002.
- LLNL, *Building 332 (UNCI), Plutonium Facility, Safety Analysis Report*, Vol. 2, Chapt. 6-17, UCRL-AR-119434-00, Lawrence Livermore National Laboratory, Defense and Nuclear Technologies Directorate, Livermore, CA, February 2002.
- LLNL, *Safety Analysis Report and Technical Safety Requirements Regarding B332 DSA*, Lawrence Livermore National Laboratory, Livermore, CA, October 10, 2003.

4. Based on the inventory of radiological materials, B-327 was determined to be a Radiological Facility (Hazards Analysis Report, October 2000). There are also explosive substances stored at this location. Because of these two types of materials, B-327 should be included in the Accident Analysis in Appendix D. In addition, lithium hydride and beryllium are used at this facility. Both warrant investigation in the SWEIS.

4/25.06

5. As we have addressed in our initial comments, Appendix D is deficient in that it does not explain the derivation of accident frequencies. It also does not provide a means of understanding the accident frequencies. Some of this is included in the background documents. For example, Section 3 of the Safety Analysis Report (SAR) for B-696R, June 2002 provides the general methodology used, and should be brought forward into the text of Appendix D. For example, accidents are divided into four groups: those that are anticipated (occurring once every 100 years); those that are unlikely (occurring once every 100 to 10,000 years); those that are extremely unlikely (once every 10,000 to 1 million years) and those that are beyond extremely unlikely (less than once every 1 million years). However, this by itself is deficient. For these levels, which are used in Appendix D, the reasoning behind the selection of the level is very general, if stated at all. It does not appear that the history of accidents that led to environmental releases at LLNL, and the history of violations, have been taken into consideration in deriving these estimates of accident frequency.

Tri-Valley CAREs, Marylia Kelly, Executive Director  
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4/25.06  
cont.

6. The SAR for B-696R (p. 3-7) states that "For unmitigated frequency estimates, equipment failures are "anticipated" (i.e., occurring once every 100 years". Equipment failures should be thoroughly analyzed in Appendix D.

7. The SAR for B-696R states that a criticality accident would be "beyond extremely unlikely". However, it would be logical that in an airplane crash scenario, drums could be damaged and brought close together resulting in a criticality event. This is a failure in the background document, and therefore a criticality event should be considered in an air craft crash scenario in Appendix D. Furthermore, the analysis of an airplane crash was not prepared per DOE STD-3014 (see p. 3-9). Therefore, the risk estimate provided in Appendix D has not undergone the correct procedure.

8. Regarding Appendix D, (Table D.2.4-1), the risk of an air craft crash is less than a spill of TRU waste or a deflagration event. These events are not fully analyzed in the SWEIS, and they should be.

9. The SAR for B-696R states (p. 3-24) that the maximum amount of plutonium equivalent Curies (PE Ci) per container is 8 Ci, and not more than 25 PE-Ci per array. This is inconsistent with the levels stated in the SWEIS (i.e., 12 PE-Ci per container). Therefore, the source term for the SAR should be revised. Has there been an amendment to the SAR?

10. Regarding Document 2055 "Memo to Tom Grim 1/27/04", please reconcile and explain crash probabilities for Building 696R, 625, 239, 331, 332, and 334 with those found in the SWEIS.

11. Regarding background document 869 "LLNL Site Wide EIS presented to Dave Conrad November 8 2002, the following information is provided concerning TRU waste is provided: under the no action alternative, D&D activities at B-332 will produce between 20 and 50 drums of TRU per year. What number is used in the SWEIS, and please explain how these values are derived.

12. The preliminary SAR for the Decontamination and Waste Treatment Facility (Sept. 1996) assumes that the tritium in a single container is assumed to be 3,000 Ci. Has this value been incorporated into the SWEIS? If it has changed please provide the reasoning or the citation.

Thank you for including these additional comments and DOE's responses in the SWEIS.

Sincerely,



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